Emily J. Tsai, WSBA #21180
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Honorable Judge Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: Adam R. Grossman, Debtor.	CHAPTER 11 BANKRUPTCY CASE NO. 10-19817-SJS DECLARATION OF COUNSEL IN SUPPORT OF ATTORNEY'S FEES FOR REPRESENTATION OF DEBTOR PURSUANT TO ORDER APPOINTING COUNSEL

I, Emily J. Tsai, declare as follows:

1) I, a member of Tsai Law Company, PLLC, was appointed special counsel for representation of the debtor in his dissolution of marriage action and I am making an application for compensation in this case for the time period September 16, 2010 through January 20, 2011.

2) Date of Order Authorizing Employment of Professional. I was appointed by Court order dated November 12, 2010, to represent Chapter 11 Debtor in Possession, Adam Grossman, as special counsel in his dissolution of marriage. Pursuant to the order allowing me to represent the debtor in his dissolution of marriage, I was authorized to charge $295.00 per hour for legal services. For trial days, I was authorized to charge $3,500.00 a day for trial itself. The debtor was also to be responsible for advancing all costs of litigation, which possible costs were outlined in my fee agreement, previously submitted.

3) Dates and Amounts Received from Prior Fee Applications. I have not previously applied for any reimbursement for fees and costs. At the time of my appointment, I had submitted that the Debtor in Possession previously paid fees of $27,500.00, from the following sources, post petition for pre appointment services rendered:

A. Lyman Opie in the amount of $20,000.00 deposited said funds by check to Tsai Law Company, PLLC, which was deposited into my IOLTA trust account for payment of fees rendered previously with Debtor's divorce proceedings. Lyman Opie is a creditor of Debtor's, but does not owe Debtor any money whatsoever and was therefore not property of the estate.

B. Peter Hendrickson in the amount of $7,500.00. Peter Hendrickson paid these funds to the undersigned by way of a charge to his credit card. Peter Hendrickson is a disinterested party in this bankruptcy proceeding, and neither owes the debtor money or is owed money by the Debtor. Said funds were gifted to the Debtor for the sole purpose of paying pre-petition

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professional fees, and would therefore not have been available to pay other creditors under any circumstances.

C. The Debtor paid the undersigned a total of $5,000.00.

All of the aforementioned funds were first deposited into the undersigned's IOLTA trust account, and have been previously drawn down by the undersigned for professional services rendered to Debtor in Debtor's divorce proceeding.

4) Source of Payment for Requested Compensation. A portion of allowed compensation and reimbursement of expenses is requested from a third party friend of the debtor, but not creditor, Mr. Dennis Vidach and debtor's relative (aunt) Susan Myers who have represented that they wish to pay a portion of the debtor's attorney's fee only, and for no other purpose. The declarations of Mr. Dennis Vidach and Ms. Susan Myers are filed contemporaneously with this application. Remaining fees are requested from the Debtor's estate, or any other third party the debtor may request for contribution for his family court attorney's fees.

5) Amount of fees and Costs Currently Requested. I hereby apply for Court approval of post petition outstanding professional fees and costs totaling $62,079.00. Copies of all billing records associated with these fees are attached hereto as Exhibit A. Mr. Grossman has incurred $10,355.17 in litigation costs which includes deposition costs, messenger fees, filing fees, and witness fees, including the testimony of the parenting evaluator. I charged a flat daily trial rate of $3,500.00 per day for my time for trial days only, and the trial was five days long, for a total attorney's fees for trial days of $17,500.00. I charged $295.00 per hour for trial preparation and

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pre and post trial motions. My associate charged $250.00 per hour to assist me in organizing financial information connected with this case. My associate incurred 14.2 hours assisting me with document preparation for this case. In addition to the trial time spent above, I spent a total of 197.2 hours from beginning to end on the dissolution of marriage matter from the time I was retained which has included discovery hearings, pre and post trial motion hearings, pre-trial conferences, at my hourly rate of $295.00 per hour. After subtracting the prior payments made pursuant to the order appointing me as counsel, the total remaining outstanding fees and costs at this time are $62,079.00 which remains unpaid. All other advanced fees collected have been applied to the bill and this is the remaining sum.

Specifically, the time spent on professional services provided by Tsai Law Company to the Debtor is as follows:

Category	**Number of Hours**	**Billing Rate**	**Rate Total**
Trial (Dissolution)	**5 DAYS**	**$3500.00/day**	**$17,500.00**
Depositions of parties and witnesses	**21.30**	**$295.00/hour**	$6,283.50
Preparation of pretrial motions, including attendance at hearings on pretrial motions and preparation of trial brief	42.00	$295.00/hour	$12,390.00
General litigation	40.60	$295.00/hour	$12,000.33

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services, including correspondence with client and opposing counsel; preparation of witness lists, subpoenas; trial preparation; document review;			
Litigation support work performed by associates;	14.20	$250.00/hour	$3,550.00
Costs/Expenses including witness fees, deposition costs, messenger fees, filing fees, etc.	N/A	N/A	$10,355.17
TOTALS (excluding trial days billed at flat fee per day):	118.10	N/A	**$62,079.00**

6) Summary of Services Provided, Result and Benefit to the Estate. As special counsel for Debtor, I provided legal counsel, documentation and assistance to the Debtor with respect to several significant aspects of this case, including the following:

(a) Providing legal counsel and assistance in determining relevant evidence of the debtor's assets and liabilities to present to the trial court in his dissolution of marriage case;

(b) Providing all litigation support and assistance in asserting the debtor's rights to various assets, the valuation of assets, and businesses;

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(c) Providing all litigation support and assistance in asserting the debtor's income and liabilities;

(d) Providing litigation support and assistance to try to dispel misrepresentations regarding debtor's assets to the trial court;

(e) Accurately determining and assessing debtor's wife's income for purposes of determining family support relative to the award of assets and liabilities;

(f) Providing all litigation support and assistance regarding issues surrounding parenting and allegations of domestic violence.

The efforts of my firm, Tsai Law Company, PLLC, together with the debtor in possession have resulted in a decision by the trial court awarding various assets and liabilities to the debtor, a parenting plan for the debtor's children and an order of child support. The allegations of debtor's wife surrounding property of the estate were grossly exaggerated to the trial court, and counsel's representation was necessary to try to present the court with a balanced and true picture of the actual assets of the estate.

7. Projection of Future Expenses and Fees and Their Anticipated Source of Payment. The debtor's trial is finished and the purpose for which Tsai Law Company PLLC appeared for representation is largely complete, though there remains some clarification of final orders and the possibility of an appeal. The debtor has indicated he is appealing the decision of the trial court, either with counsel or pro se. Tsai Law Company, PLLC is willing to extend to the debtor some

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unbundled legal services on this basis, provided the debtor continues to find a means of paying down existing attorney's fees.

I request an order approving payment of the sum of $29,500.00 from the third parties previously mentioned against the current outstanding fees owed and held in trust for this purpose only on behalf of said third parties. It is my understanding that the above individuals are friends and relatives of Mr. Grossman but that they do not employ him, nor are these sums intended to be loans to him, but are strictly to pay down his legal fees and will not be paid for any other purpose. I am requesting that the balance of fees owed by Mr. Grossman to me be approved and paid out of the bankruptcy estate. If $29,500.00 is paid against the balance owed, the remaining balance due will be $32,579,00.

It is my understanding that Mr. Grossman's ex wife continues to make post trial motions in family court. Should Mr. Grossman need full legal representation in these matters in the future by our firm, his outstanding balance will need to be paid down significantly.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing statements are true and correct.

Dated this 28th day of March, 2011.

Emily J. Tsai

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EXHIBIT A TO DECLARATION OF EMILY J. TSAI

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE,
CASE NUMBER 10-19817-SJS

Tsai Law Company, PLLC

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Invoice

DATE	INVOICE #
09/29/2010	3259
TERMS	**DUE DATE**
Net 15	10/14/2010

BILL TO
Adam Grossman

BALANCE DUE	ENCLOSED
$2,348.50	

Please detach top portion and return with your payment.

Date	Activity	Quantity	Rate	Amount
09/16/2010	Prepare Notice of Limited Appearance; corresp. to Karma Zaike, Five Notices of Deposition regarding dissolution of marraige; four subpoenas for depositions; contact process server, corresp w/ process server, telecon w/[redacted]	3:30	295.00	1,032.50
09/22/2010	Intake meeting [redacted] Discussion of [redacted] case. Review [redacted] telecon w/ Jennie Laird.	4:18	295.00	1,268.50
09/23/2010	Scheduling emails re: depositions. Telecon from Mr. Litov.	0:30	295.00	147.50
09/29/2010	Minimum Trust Balance Requirement PLEASE NOTE TRUST ACCOUNT POLICY: If your current trust balance is $1,000 or less, those funds will be held to maintain the minimum required trust balance. If your current trust balance exceeds $1,000, those funds in excess of $1,000 will be applied to any outstanding charges.			

Transfers from trust are pending and will occur 5 days from the date of this invoice. Visa, Mastercard and American Express are accepted.

TOTAL	$2,448.50
PAYMENT	$100.00
BALANCE DUE	$2,348.50

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DATE	INVOICE #
10/01/2010	3318
TERMS	DUE DATE
Net 15	10/16/2010

BILL TO
Adam Grossman

AMOUNT DUE	ENCLOSED
$2,448.50	

Please detach top portion and return with your payment.

DATE	ACCOUNT SUMMARY	AMOUNT
09/29/2010	Balance Forward	$2,448.50
	New charges (see details below)	0.00
	TOTAL AMOUNT DUE	$2,448.50

Date	Activity	Quantity	Rate	Amount
09/27/2010	Prepare notice [redacted]; meeting w/ client re: notice and deposition of Tzachi Litov; possible other deponents.	4:30	295.00	1,327.50
09/28/2010	Meeting [redacted] and prepare for deposition of Tzachi Litov; review protection order allegations; [redacted] review witness and exhibit list; outline exhibits for deposition, multiple emails [redacted]	3:30	295.00	1,032.50
09/29/2010	Deposition of Tzachi Litov; post deposition meeting.	3:18	295.00	973.50
09/30/2010	Review email [redacted] review court pleadings.	2:00	295.00	590.00
10/01/2010	Subpoena duces tecum and notice to Sam Perlin; email Jennie Laird; review email from client.	1:00	295.00	295.00

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TOTAL OF NEW CHARGES	$4,218.50
DEPOSIT	$4,218.50
BALANCE OF NEW CHARGES	$0.00
TOTAL AMOUNT DUE	$2,448.50

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Invoice

DATE	INVOICE #
10/27/2010	3383
TERMS	**DUE DATE**
Net 15	11/11/2010

BILL TO
Adam Grossman

AMOUNT DUE	ENCLOSED
$7,778.79	

Please detach top portion and return with your payment.

DATE	ACCOUNT SUMMARY	AMOUNT
09/29/2010	Balance Forward	$2,448.50
	New charges (see details below)	5,330.29
	TOTAL AMOUNT DUE	$7,778.79

Date	Activity	Quantity	Rate	Amount
09/29/2010	[redacted]ee paid [redacted]			280.00
10/05/2010	Various emails from Karma Zaike; letter to deponents; telecon to client.	1:00	295.00	295.00
10/06/2010	Declaration and exhibits on deposition scheduling.	4:30	295.00	1,327.50
10/07/2010	Review motion to quash; send motion [redacted] begin drafting response to motion to quash subpoenas and for order shortening time. Prepare draft [redacted] re: motion to quash.	6:00	295.00	1,770.00
10/08/2010	Working Copies Submission Fee - King County Superior Court			21.49
10/08/2010	Finalize motion to quash subpoenas; review parenting evaluation for excerpts; prepare supplemental declaration re: emails; review caselaw; prepare proposed order.	4:00	295.00	1,180.00
10/11/2010	Ex Parte Confirmation Fee - King County Superior Court			21.49
10/11/2010	Prepare for deposition of Sam Perlin.	2:00	295.00	590.00
10/12/2010	Listen to [redacted] hearing tape, findings of court, request for clarification from the court re: subpoenas.	4:00	295.00	1,180.00
10/14/2010	Scheduling, meeting [redacted] review of emails.	5:00	295.00	1,475.00
10/15/2010	Prepare ER 904 documents and submission for trial	5:00	295.00	1,475.00
10/17/2010	Finish Response to motion to compel.	6:30	295.00	1,917.50
10/18/2010	Case Access Fee to KCSC & 1470 Pages of Copies of File			950.31
10/18/2010	Attend CR 16 conference with court.	1:30	295.00	442.50
	Continue to the next page.			

Date	Activity	Quantity	Rate	Amount
10/19/2010	Emails [redacted]; telecon [redacted] email with opposing counsel; begin drafting questions [redacted]	1:00	295.00	295.00
10/21/2010	Review declarations and prepare for depostions of Beth Huppin and Dr. Ronald Schneeweiss.	2:00	295.00	590.00
10/22/2010	Depositions of Dr. Schneeweiss; Beth Huppin; meeting [redacted] brief telecon w/ [redacted] Cooper	7:00	295.00	2,065.00
10/24/2010	Prepare witness and exhibit list; prepare for depositions of Beth Singer; Irit Eliav	8:00	295.00	2,360.00
10/25/2010	Depositions of Beth Hupin; Sam Perlin; Irit Eliav. Telecon [redacted] Supplemental discovery; letter to Karma Zaike re: supplemental discovery.	7:48	295.00	2,301.00
10/26/2010	Supplemental Witness and Exhibit List; telecon [redacted]: additional materials; to courthouse for sealed documents.	5:00	295.00	1,475.00
10/27/2010	Minimum Trust Balance Requirement PLEASE NOTE TRUST ACCOUNT POLICY: If your current trust balance is $1,000 or less, those funds will be held to maintain the minimum required trust balance. If your current trust balance exceeds $1,000, those funds in excess of $1,000 will be applied to any outstanding charges.			0.00
10/27/2010	Parenting Evaluator Kelly Shanks	1	3,300.00	3,300.00

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TOTAL OF NEW CHARGES	$25,311.79
DEPOSIT	$19,981.50
BALANCE OF NEW CHARGES	$5,330.29
TOTAL AMOUNT DUE	$7,778.79

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Invoice

DATE	INVOICE #
11/29/2010	3477
TERMS	DUE DATE
Net 15	12/14/2010

BILL TO
Adam Grossman

AMOUNT DUE	ENCLOSED
$46,813.79	

Please detach top portion and return with your payment.

DATE	ACCOUNT SUMMARY	AMOUNT
10/27/2010	Balance Forward	$7,778.79
[redacted]		-2,500.00
[redacted]		-1,191.00
	New charges (see details below)	42,726.00
	TOTAL AMOUNT DUE	$46,813.79

Date	Activity	Quantity	Rate	Amount
10/28/2010	Deposition of Jill Borodin; discussion w/ Karma Zaike re: additional discovery; draft letter summarizing discussion.	3:12	295.00	944.00
10/29/2010	Various emails [redacted] asset and debt distribution, bankruptcy.	0:48	295.00	236.00
11/01/2010	Deposition of Tzachi Litov			162.50
11/01/2010	Deposition of Sam Perlin			205.00
11/01/2010	Deposition of Jill Borodin	7:42	295.00	2,271.50
11/02/2010	Begin motions in limine	1:30	295.00	442.50
11/04/2010	Prepare motions in limine.	3:30	295.00	1,032.50
11/05/2010	Serve and file Motions in Limine; prepare note for motion; prepare proposed order; arrange exhibits.	5:00	295.00	1,475.00
11/07/2010	Draft Trial Brief	8:00	295.00	2,360.00
11/08/2010	Complete trial brief; [redacted] for court; complete requested distribution of assets and liabilities.	7:00	295.00	2,065.00
11/09/2010	Telecon w/ client; email client; email Zaike re: deadlines.	0:24	295.00	118.00
11/10/2010	Begin response to petitioner's motions in limine.	5:00	295.00	1,475.00
11/11/2010	Complete response to motions in limine	4:00	295.00	1,180.00
11/12/2010	Meeting [redacted] compile additional exhibits for trial;	3:12	295.00	944.00
11/12/2010	Begin reply to response to motion in limine.	2:00	295.00	590.00
11/13/2010	Prepare cross examination for Jill Borodin, track inconsistent testimony; meeting with [redacted]	7:30	295.00	2,212.50
	Continue to the next page.			

Date	Activity	Quantity	Rate	Amount
11/14/2010	Prepare opening statement; prepare direct examination of Kelly Shanks.	2:30	295.00	737.50
11/15/2010	Trial daily rate.	1:00	3,500.00	3,500.00
11/16/2010	Drafted findings of fact and conclusions of law, decree of dissolution.	1:12	250.00	300.00
11/16/2010	Edited Findings and Conclusions of Law and Decree of Dissolution to provide for reciprocal hold harmless clauses, and list proposed separate liabilities.	0:24	250.00	100.00
11/16/2010	Trial daily rate.	1:00	3,500.00	3,500.00
11/17/2010	Reviewed produced document binders for K-1 and deposits to bank accounts to assist trial preparation	1:30	250.00	375.00
11/17/2010	Trial daily rate.	1:00	3,500.00	3,500.00
11/18/2010	INDABA- NUH HUMPHRIES	1	200.00	200.00
11/18/2010	Trial daily rate.	1:00	3,500.00	3,500.00
11/19/2010	JASON RUIZ	1	1,525.00	1,525.00
11/19/2010	[redacted]	1	215.00	215.00
11/19/2010	Trial daily rate	1:00	3,500.00	3,500.00
11/21/2010	Prepare closing argument; review parenting plan changes; review decree of dissolution; review findings.	6:00	295.00	1,770.00
11/22/2010	[redacted]evisions to closing argument; revise closing argument.	3:00	295.00	885.00
11/23/2010	Prepare worksheets and order of child support. Further revisions to final documents; email [redacted] finals	3:00	295.00	885.00
11/24/2010	Telecon[redacted]nd review final documents.	0:54	250.00	225.00
11/29/2010	Finalize all docs for submission to court.	1:00	295.00	295.00

Transfers from trust are pending and will occur 5 days from the date of this invoice. Visa, Mastercard and American Express are accepted.

TOTAL OF NEW CHARGES	$42,726.00
TOTAL AMOUNT DUE	$46,813.79

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Invoice

DATE	INVOICE #
01/10/2011	3616
TERMS	**DUE DATE**
Net 15	01/25/2011

BILL TO
Adam Grossman AMENDED

AMOUNT DUE	ENCLOSED
$56,468.69	

Please detach top portion and return with your payment.

DATE	ACCOUNT SUMMARY	AMOUNT
11/29/2010	Balance Forward	$46,813.79
	New charges (see details below)	9,654.90
	TOTAL AMOUNT DUE	$56,468.69

Date	Activity	Quantity	Rate	Amount
11/15/2010	Billable expense			361.70
11/15/2010	Billable expense			401.20
11/15/2010	Billable expense			303.80
11/19/2010	Billable expense			0.00
11/19/2010	Billable expense			215.00
12/03/2010	Various emails [redacted] telecon [redacted]	0:18	295.00	88.50
12/06/2010	Deposition of Jill I. Borodin			408.00
12/06/2010	Deposition of Jill I. Borodin, Vol II			1,010.20
12/14/2010	Attend presentation hearing.	4:30	295.00	1,327.50
12/21/2010	Telecon [redacted]	1:12	295.00	354.00
12/22/2010	Prepare Motion for Reconsideration.	3:30	295.00	1,032.50
12/23/2010	Drafted proposed final parenting plans with and without supervised visitation.	2:12	250.00	550.00
12/23/2010	Motion for reconsideration; proposed Decree and Exhibit A; Declaration [redacted] and Exhibits; Sealed Financial Source Doc. and Retrieving Exhibits.	4:30	295.00	1,327.50
12/28/2010	Drafted response to request for attorney fees.	3:06	250.00	775.00
12/30/2010	Drafted declaration of client in opposition to attorney fees.	0:48	250.00	200.00
12/30/2010	Drafted response to motion to correct clerical error.	0:42	250.00	175.00
01/03/2011	Drafted motion to continue hearing and shorten time, and proposed order.	0:54	250.00	225.00
	Continue to the next page.			

Date	Activity	Quantity	Rate	Amount
01/03/2011	Meeting [redacted] regarding attorney fees response, [redacted]	1:42	250.00	425.00
01/03/2011	Prepared and filed motion to continue opposing party's motion to enforce decree.	0:12	250.00	50.00
01/04/2011	[redacted] drafted letter as requested [redacted] and sent by email [redacted]	0:30	250.00	125.00
01/06/2011	Drafted order to shorten time and order to continue hearing; also proposed order denying enforcement without prejudice with judgment summary, and attorney fee declaration.	1:12	250.00	300.00
01/10/2011	Minimum Trust Balance Requirement PLEASE NOTE TRUST ACCOUNT POLICY: If your current trust balance is $1,000 or less, those funds will be held to maintain the minimum required trust balance. If your current trust balance exceeds $1,000, those funds in excess of $1,000 will be applied to any outstanding charges.			

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AMENDED INVOICE

TOTAL OF NEW CHARGES	$9,654.90
TOTAL AMOUNT DUE	$56,468.69

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Invoice

DATE	INVOICE #
01/27/2011	3749
TERMS	DUE DATE
Net 15	02/11/2011

BILL TO
Adam Grossman

AMOUNT DUE	ENCLOSED
$60,163.57	

Please detach top portion and return with your payment.

DATE	ACCOUNT SUMMARY	AMOUNT
01/10/2011	Balance Forward	$56,468.69
	New charges (see details below)	3,694.88
	TOTAL AMOUNT DUE	$60,163.57

Date	Activity	Quantity	Rate	Amount
10/01/2010	Messenger			27.50
10/21/2010	Messenger			9.50
10/22/2010	Messenger			44.50
10/26/2010	Messenger			39.50
11/08/2010	Messenger			27.50
11/08/2010	Deposition of Sam Perlin - Transcript			205.00
11/08/2010	Deposition			55.00
11/15/2010	Messenger			49.50
12/27/2010	Messenger			9.50
01/05/2011	Prepare response to motion to enforce decree of dissolution. Compile exhibits for response; prepare declaration regarding attorney notice of absence.	3:30	295.00	1,032.50
01/05/2011	Filing Fee for Response to Attorney Declaration			21.49
01/05/2011	Filing Fee for Declaration of Adam Grossman			21.49
01/11/2011	Various emails w/ client; organize documents for hearing.	1:00	295.00	295.00
01/12/2011	Appear in family court; appear in ex parte; prepare proposed orders on clarification; letter to [redacted]	5:00	295.00	1,475.00
01/14/2011	Telecon [redacted] deadlines for upcoming hearings [redacted]	0:24	295.00	118.00
01/20/2011	[redacted]			263.90
	Continue to the next page.			

Date	Activity	Quantity	Rate	Amount
01/27/2011	Minimum Trust Balance Requirement PLEASE NOTE TRUST ACCOUNT POLICY: If your current trust balance is $1,000 or less, those funds will be held to maintain the minimum required trust balance. If your current trust balance exceeds $1,000, those funds in excess of $1,000 will be applied to any outstanding charges.			

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TOTAL OF NEW CHARGES	$3,694.88
TOTAL AMOUNT DUE	$60,163.57

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emily@tlclawco.com

Honorable Judge Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: Adam R. Grossman, Debtor.	CHAPTER 11 BANKRUPTCY CASE NO. 10-19817-SJS DECLARATION OF DENNIS VIDACH

I, Dennis Vidach, declare

I am a friend of Adam Grossman's and have known him for over 25 years. I am not a creditor of Adam Grossman's. I am remitting $9,500.00 to Emily J. Tsai to pay attorney's fees for her services in family court for Adam Grossman. I am making a gift of this sum for the sole purpose of paying his attorney in his family law action, and I am not receiving any compensation

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from Adam, nor promise of compensation from Adam Grossman in return for gifting his attorney this money to pay for his attorney's fees. I intend to give this money for this purpose only, and if the money is not to be used for this purpose, it must be returned to me.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing statements are true and correct.

Dated this 28 day of January, 2011.

Dennis Vidach

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Honorable Judge Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: Adam R. Grossman, Debtor.	CHAPTER 11 BANKRUPTCY CASE NO. 10-19817-SJS DECLARATION OF SUSAN MEYERS

I, Susan Meyers, declare

I am a Adam Grossman's aunt and have known Adam for nearly his entire life. I am not a creditor of Adam Grossman's. I am remitting $20,000 to Emily J. Tsai to pay attorney's fees for her services in family court for Adam Grossman. I am making a gift of this sum for the sole purpose of paying his attorney in his family law action, and I am not receiving any compensation from Adam, nor promise of compensation from Adam Grossman in return for gifting his attorney this money to pay for his attorney's fees. I intend to give this money for this purpose only, and if the money is not to be used for this purpose, it must be returned to me.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing statements are true and correct.

Dated this 2ND day of February, 2011.

Susan Meyers

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